

**REMARKS/ARGUMENTS**

In Response to the Office Action dated November 13, 2007, Applicant respectfully requests reconsideration.

**Claim Rejections Under 35 U.S.C. §112**

Claim 52 is rejected for insufficient antecedent basis for the term "array" in line 10. Applicant has amended line 10 to recite an "array of heat-producing elements" in two locations. Applicant respectfully asserts that these amendments do not warrant a new search as the term "array" was apparently searched by the Examiner in accordance with these amendments.

Claim 75 was noted by the Examiner for the use of "at least one of" in combination with "and," with the Examiner noting that this claim was searched for either condition. Applicant has amended claim 75 to clarify that the Examiner's interpretation of claim 75 was what Applicant intended, and what Applicant believes was correct in accordance with both claim 75 before and after the amendments.

**Claim Rejections Under 35 U.S.C. §103**

Claims 52-55, 57-62, 68 and 70-73

Claims 52-55, 57-62, 68 and 70-73 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Pat. No. 5,826,432 (Ledbetter) in view of U.S. Pat. No. 5,952,842 (Fujimoto).

Applicant respectfully asserts that independent claim 52, and claims 53-55, 57-62, 68, and 70-73 are patentable over Ledbetter in view of Fujimoto under any reading of Ledbetter. Ledbetter discusses a blast chiller that includes a fan 170 that forces air into a high pressure chamber 190 as directed by a turning vane 174. FIGS. 4, 12A-12B, col. 7, l. 67 - col. 8, l. 2. Fujimoto discusses a test head cooling system for cooling test heads of a semiconductor IC test apparatus in an enclosed structure. Abstract. Neither Ledbetter nor Fujimoto teaches, discloses, or suggests, alone or in combination, a data center system that includes an impeller array of vertically arranged impellers that vertically overlap with an inlet of a plenum, that horizontally

impel a substantially uniform curtain of gas substantially horizontally during an entire circulation of the gas through an equipment chamber and a heat exchanger chamber of a cabinet in which the impeller array is disposed, and that provides N+1 redundancy of gas impelling, as recited in claim 52. For at least these reasons, independent claim 52 is, and 53-55, 57-62, 68, and 70-73 that depend from claim 52 are, patentable over Ledbetter in view of Fujimoto.

#### Claim 75

Although not specifically noted in the Examiner's remarks, Applicant believes the Examiner is rejecting claim 75 over Ledbetter in view of Fujimoto as claim 75 was previously rejected over Ledbetter, and the Examiner asserted in the Examiner's Response to Arguments section that Ledbetter teaches the features of claim 75. Office Action, p. 11. Applicant respectfully asserts that claim 75, that depends from claim 52, is patentable in view of Ledbetter in view of Fujimoto for the reasons discussed above with respect to claim 52, and for further reasons. Claim 75 recites a door configured to provide selective access to the heat-producing units based on at least one of an environmental compatibility inside and outside the cabinet, and whether an outer enclosure around the cabinet is closed. The text at col. 9, ll. 47-63 cited by the Examiner discusses that a target product temperature can be set, i.e., for the interior of a blast chiller. There is no discussion of an external temperature or any other environmental parameter, let alone compatibility between an environment inside and an environment outside the chiller. Ledbetter thus does not teach, disclose, or suggest that a door is configured to provide selective access based on environmental compatibility inside and outside of a cabinet, or whether an outer enclosure around the cabinet is closed. Applicant respectfully asserts that claim 75 is patentable in view of Ledbetter in view of Fujimoto for these further reasons.

#### Claim 64

Claim 64 is rejected under 35 U.S.C. §103(a) as being unpatentable over Ledbetter in view of Fujimoto and further in view of U.S. Pat. No. 6,104,003. Applicant

respectfully asserts that claim 64, that depends from claim 52, is patentable over Ledbetter in view of Fujimoto in view of Jones for at least the reasons discussed above.

Claims 65-66

Claims 65-66 are rejected under 35 U.S.C. §103(a) as being unpatentable over Ledbetter in view of Fujimoto and further in view of U.S. Pat. No. 3,387,648 (Ward). Applicant respectfully asserts that claims 65-66, that depend from claim 52, are patentable over Ledbetter in view of Fujimoto in view of Ward for at least the reasons discussed above.

Claim 67

Claim 67 is rejected under 35 U.S.C. §103(a) as being unpatentable over Ledbetter in view of Fujimoto and further in view of U.S. Pat. No. 6,302,147 (Rose). Applicant respectfully asserts that claim 67, that depends from claim 52, is patentable over Ledbetter in view of Fujimoto in view of Rose for at least the reasons discussed above.

Claims 76-78

Claims 76-78 are rejected under 35 U.S.C. §103(a) as being unpatentable over Ledbetter in view of Fujimoto and further in view Applicant's admitted Prior art figure 1. Applicant respectfully asserts that claims 76-78, that depend from claim 52, are patentable over Ledbetter in view of Fujimoto in view of Applicant's FIG. 1 for at least the reasons discussed above.

New Claims

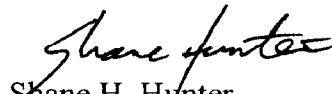
Applicant has added claims 97-101. These claims do not add new matter. Claims 97-98 depend from claim 52 and are therefore patentable for at least the reasons discussed above with respect to claim 52. Applicant further believes that independent claim 99 is, and its dependent claims 100-101 are, patentable over the art of record.

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 858-350-6100.

Respectfully submitted,

  
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